SO ORDERED.

/s/ Alvin K. Hellerstein
October 7, 2022

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October 6, 2022

Via ECF Only

Honorable Alvin K. Hellerstein, U.S.D.J.
Unites States District Court
Southern District of New York
New York, New York 10007
(212) 805-0152

Re: *Katzel v. AIG*
        Case No: 20-CV-07220 (AKH)

Dear Judge Hellerstein:

We represent the Plaintiff, Aaron Katzel, in the above-referenced matter. We write, with the consent of counsel for the Defendant, AIG.

Specifically, we write to request that the Court place a temporary block on four documents submitted in conjunction with Plaintiff's Summary Judgment Motion.

The four documents constitute Exhibits 54; 54-1; 54-2; and 69 from Mr. Brickman's Declaration in Opposition to Summary Judgment. The temporary block is required – as per the ECF Clerk – to allow Plaintiff to refile that Declaration and relevant Exhibits so as to redact certain confidential or proprietary information pertaining to Accenture, a non-Party in this action. Accenture brought the inadvertent production to our attention and has requested that redacted versions of these documents be substituted in the public record. As the redactions requested would have been in compliance with, and pursuant to, the Court's Individual Practice Rule 4(b)(i) had they been originally made, we respectfully request that the Court grant the instant request.

As noted above, we have communicated with the ECF Clerk and have been informed that the only way that the amended filing can be made is if a hold is confirmed by the Court. As further noted above, we have consulted with counsel for AIG and they consent to this request.

We thank the Court for its time, attention, and assistance in this regard.

Respectfully submitted,

Ethan Leonard (EL2497)

Cc: All counsel (Via ECF - On consent)

IT IS SO ORDERED

Date: _____   _____

Hon. Alvin K. Hellerstein
United States District Court Judge

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